

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 16**

| | | |
|--|---|--------------------------|
| CONSOLIDATED COMMUNICATIONS, INC., | § | |
| | § | |
| | § | |
| Respondent, | § | |
| | § | |
| and | § | CASE 16-CA-196201 |
| | § | |
| COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO, | § | |
| | § | |
| | § | |
| Charging Party. | § | |

**CHARGING PARTY’S UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO
FILE BRIEFS WITH THE ADMINISTRATIVE LAW JUDGE**

COMES NOW Charging Party Communications Workers of America, AFL-CIO (hereinafter “Charging Party”) and, pursuant to Section 102.42 of the Rules and Regulations (“R&R”) of the National Labor Relations Board (“NLRB” or “the Board”), files this unopposed motion to extend the deadline to submit briefs to the Administrative Law Judge and in support thereof would respectfully show the following:

1. Briefs to the Administrative Law Judge are currently due in this case on Friday, February 16, 2018.
2. Counsel for Charging Party suffered a death in his family on February 11, 2018 when his father-in-law passed away.
3. Services are scheduled for February 16th.
4. Charging Party requests the deadline for all parties to file briefs with the Administrative Law Judge in this case be extended to Wednesday, February 21st.

5. Counsel for Charging Party has conferred with the other parties to this case and they do not object to the deadline for all parties to submit briefs being extended to February 21st.

6. This extension is not sought for the purposes of delay or to prejudice another party.

CONCLUSION

For all the foregoing reasons, Charging Party prays that this unopposed motion be granted and the deadline for all parties to submit briefs to the Administrative Law Judge in this case be extended to Wednesday, February 21, 2018.

Respectfully Submitted,

DAVID VAN OS & ASSOCIATES, P.C.

/s/ Matt Holder

Matt Holder

Texas State Bar No. 24026937

Email: matt@vanoslaw.com

8626 Tesoro Dr., Ste. 510

San Antonio, Texas 78217

Telephone: 210/824-2653

Facsimile: 210/824-3333

Counsel for Charging Party

CERTIFICATE OF CONFERENCE

This section is to certify that Counsel for Charging Party conferred with Counsel for the General Counsel and Counsel for Respondent on February 14-15, 2018 and both parties indicated they did not oppose the relief sought in this motion.

/s/ Matt Holder

Matt Holder

CERTIFICATE OF SERVICE

This section is to certify service of the above and foregoing instrument has been forwarded electronically to the parties below on February 15, 2018 as follows:

Bryan Dooley
National Labor Relations Board, Region 16
819 Taylor Street, Rm. 8A24
Fort Worth, Texas 76102-6178
Bryan.Dooley@nlrb.gov

Counsel for the General Counsel

David Lonergan
Amber Rogers
Hunton and Williams LLP
1445 Ross Avenue, Suite 3700
Dallas, Texas 75202
Telephone: (214) 979-3061; (214) 979-3308
Facsimile: (214) 979-3932
E-mail: dlonergan@hunton.com
arogers@hunton.com

Counsel for Respondent

/s/ Matt Holder
Matt Holder